

EXHIBIT D-4
VEASEY-LULAC
EXCESSIVE

**EXCESSIVE
BARON**

Neil Baron			
DATE		HOURS	Code
11/15/13	Phone conference with Court regarding Initial Conference	0.50	E
11/15/13	Review Minute Entry for proceedings held before Judge Ramos - Intitial Pretrial Conference	0.20	E
11/22/13	Phone conference with Judge Ramos regarding status of case and scheduling order	1.00	E
02/12/14	Telephonic conference with Court regarding status of case	1.00	E
02/14/14	Review Transcript from Status Conference held 2-14-14 before Judge Ramos (doc 168)	0.20	E
02/14/14	Review Order denying United States' Motion to Modify the Scheduling Order (doc 170)	0.20	E
02/19/14	Review Transcript of hearing held on 2-14-14 before Judge Ramos (doc 176)	0.20	E
02/27/14	Review Order Granting Hidalgo County Leave to be Added as A Party (doc 188)	0.10	E
04/01/14	Attend hearing	2.50	E
05/15/14	Hearing in Corpus Christi	4.00	E
05/20/14	Review Minute Entry for Proceedings held before Judge (Telephonic Conference)	0.20	E
05/21/14	Telephonic Conference with Court	0.50	E
TOTAL <u>10.6</u>			

~~EXHIBIT B~~
**EXCESSIVE
 BRAZIL-DUNN**

Date	User	Description	Billable Time/ Cost Price	Code
08/21/2013	Chad Dunn	Continue edits to amended complaint	0.40	E
10/04/2013	Chad Dunn	Prepare for and attend court status hearing to discuss government shutdown	3.20	B, E
10/18/2013	Chad Dunn	Prepare for and attend status conference to discuss status of case and briefing schedule	2.90	B, E
11/15/2013	Chad Dunn	Prepare for and attend hearing. Conference with the court regarding arranging for transcript of hearing.	3.50	B,E
11/21/2013	Chad Dunn	Continue work on edits for Response to Motion to Dismiss	0.70	E
12/04/2013	Chad Dunn	Continue edits to draft of second amended Veasey complaint.	0.50	E
02/12/2014	Chad Dunn	Prepare for and attend status conference	2.80	E
02/14/2014	Chad Dunn	Prepare for and participate in hearing regarding scheduling and other matters	2.50	B,E
02/27/2014	Chad Dunn	Receive and review Unopposed Motion to Add Party Hidalgo County	0.10	E
03/05/2014	Chad Dunn	Prepare for and attend hearing on motion to compel	3.70	B,E
04/01/2014	Chad Dunn	Prepare for and attend in-person hearing in Corpus Christi	3.90	B,E
04/08/2014	Chad Dunn	Participate in trial preparation meeting of all Veasey Plaintiffs' counsel	6.50	D,E
04/08/2014	Chad Dunn	Prepare for and telephone attend status conference	1.10	B,E
04/09/2014	Chad Dunn	Continue in-person meeting with all Veasey Plaintiffs' counsel in preparation for depositions and trial	5.50	E
05/01/2014	Chad Dunn	Prepare for and attend hearing on Motion to Quash Subpoena of Third Party Legislators	3.60	B,E
05/15/2014	Chad Dunn	Prepare for and attend Status Conference	2.90	B,E
05/15/2014	Chad Dunn	Receive and review court's minute entry for 5-15-14 Status Conference.	0.10	E
05/20/2014	Chad Dunn	Prepare for and attend telephonic status conference	2.70	B,E
05/28/2014	Chad Dunn	Prepare for and attend hearing	4.20	B,E
06/06/2014	Chad Dunn	Prepare for and attend status conference	2.70	B,E
06/18/2014	Chad Dunn	Prepare and attend status conference	2.80	B,E
07/24/2014	Chad Dunn	Prepare for and attend status conference	2.70	B,E
07/30/2014	Chad Dunn	Prepare for and attend status conference	2.50	B,E
08/06/2014	Chad Dunn	Prepare for and attend Status Conference	2.90	B,E
08/14/2014	Chad Dunn	Prepare for and attend status conference	2.40	B,E
08/27/2014	Chad Dunn	Attend final pretrial conference	4.50	E
08/28/2014	Chad Dunn	Attend status conference and hearing on Plaintiffs' Motion regarding unsealed document	4.70	E
08/29/2014	Chad Dunn	Attend status conference	2.50	E
09/02/2014	Chad Dunn	Attend Trial (Day 1)	10.20	E
09/03/2014	Chad Dunn	Attend Trial (Day 2)	10.20	E

~~EXHIBIT B~~
**EXCESSIVE
BRAZIL-DUNN**

09/04/2014	Chad Dunn	Attend trial (Day 3)	10.20	E
09/05/2014	Chad Dunn	Attend trial (Day 4)	10.00	E
09/08/2014	Chad Dunn	Attend trial (Day 5)	10.20	E
09/09/2014	Chad Dunn	Attend trial (Day 6)	10.20	E
09/10/2014	Chad Dunn	Attend trial (Day 7)	10.20	E
08/27/2015	Chad Dunn	Prepare for and participate in person settlement conference with state and all other parties	8.70	E

TOTAL 158.4

**EXCESSIVE
BRAZIL-DUNN**

Date	User	Description	Billable Time/ Cost Price	Code
11/15/2013	Scott Brazil	Attend Civil Initial Pretrial Conference by telephone	0.90	D, E
03/05/2014	Scott Brazil	Prepare for and attend hearing on motion to compel by phone.	2.50	E,D
04/01/2014	Scott Brazil	Telephone attend in-person hearing in Corpus Christi	3.00	E, D
04/08/2014	Scott Brazil	Prepare for and telephone attend status conference	1.10	E,D
04/09/2014	Scott Brazil	Continue in-person meeting with all Veasey Plaintiffs' counsel in preparation for depositions and trial	5.50	D,E
05/01/2014	Scott Brazil	Telephone attend hearing on Motion to Quash Subpoena of Third Party Legislators	2.20	D, E
05/15/2014	Scott Brazil	Telephone attend Status Conference	1.20	D, E
05/20/2014	Scott Brazil	Prepare for and attend telephonic status conference	2.70	D, E
05/28/2014	Scott Brazil	Telephone attend status conference	2.40	D, E
05/30/2014	Scott Brazil	Conference with voter in Lufkin denied from voting for lack of ID	0.40	E,D
06/18/2014	Scott Brazil	Telephone attend status conference	1.50	D,E
07/24/2014	Scott Brazil	Telephone attend status conference	2.30	D,E
07/30/2014	Scott Brazil	Telephone attend status conference	1.80	D,E
08/06/2014	Scott Brazil	Telephone attend Status Conference	1.80	D,E
09/02/2014	Scott Brazil	Attend Trial (Day 1)	10.20	E,D
09/03/2014	Scott Brazil	Attend Trial (Day 2)	10.20	E,D
09/04/2014	Scott Brazil	Attend trial (Day 3)	10.20	E,D
09/05/2014	Scott Brazil	Attend trial (Day 4)	10.00	E,D
09/08/2014	Scott Brazil	Attend trial (Day 5)	10.20	E,D
09/09/2014	Scott Brazil	Attend trial (Day 6)	10.20	E,D
09/10/2014	Scott Brazil	Attend trial (Day 7)	10.20	E,D
09/11/2014	Scott Brazil	Attend trial (Day 8)	7.10	E,D

TOTAL 107.6

**EXCESSIVE
CLC**

Date	J. Gerald Hebert Description	Time (Hrs/tenths)	Code
	plaintiffs, adding new claims in an amended complaint	1.7	D,E
12.6.13	Prepare second amended complaint for clients	1.1	D,E
	next discovery actions to be taken, trial schedule	1.1	D,E
	current experts & what analyses we want them to perform	7.1	D,E,N
	current experts & what analyses we want them to perform	10.3	D,E
	assignment of responsibilities	1.1	D,E
	strategy and assignments to avoid duplication	2.5	D,E
	litigation responsibilities & strategies	1	D,E
	needed, coordination of same & assignments	1.5	D,E
	assignments; legal research of issues needed	1.5	V,D,E
5.8.14	TC w/all private plaintiffs' attys re: discovery coord.	1	V,D,E
	discovery planning	1.1	D,E
	disputes/issues	1.7	D,E
	planned discovery, expert timetable (& data needed)	1.8	D,E
5.22.14	TC w/all private plaintiffs re: outstanding & future discovery	1.1	D,E
5.22.14	Call w/all plaintiffs (including DOJ) re: discovery	0.9	D,E
5.29.14	TC w/private plaintiffs (weekly status call to coordinate)	1	D,E
5.29.14	TC w/all plaintiffs (including DOJ) (weekly status)	0.5	D,E
5.30.14	TC w/Veasey-LULAC team re: discovery, data, next steps	1.5	V,D,E
	to be contacted.	1.6	V,D,E
	further discovery)	0.7	D,E
	work being performed by experts.	1.9	D,E
	schedule	3	D,E
	witnesses; discuss deposition transcripts to be reviewed	1.3	D,E
	upcoming deadlines	0.8	D,E
	plaintiff groups are working on.	0.7	D,E
7.2.14	Call with Veasey-LULAC legal team re: expert reports	1.5	D,E
	team assignments; expert reports & depositions	1.1	D,E
	trial preparations	4.5	D,E
	later today	0.4	D,E
9.11.14	Attend & participate Eighth day of trial (today TX rested)	4.1	E

TOTAL 61.1

EXCESSIVE
CLC

<u>Daniel Lang Description</u>	<u>Date</u>	<u>Time</u>	<u>Code</u>
Drafting en banc brief	4/29/2016	1.5	E
Drafting en banc brief	4/30/2016	7.0	E
Drafting en banc brief	5/1/2016	11.0	E
Drafting en banc brief	5/3/2016	7.2	E
Drafting en banc brief	5/3/2016	0.5	E
Drafting en banc brief	5/4/2016	6.0	E
Drafting en banc brief	5/4/2016	1.4	E
Drafting en banc brief	5/9/2016	10.2	E
TOTAL		44.8	

~~EXHIBIT B~~

EXCESSIVE

CLC

J. Bone Description	Date	Time	Code
Work on COL	9/17/2014	14	E
Work on COL	9/18/2014	7	E
Closing argument preparation	9/21/2014	5.5	E
Work on motion to expedite	11/25/2014	1	V,E
Drafting appellate brief section	2/3/2015	6.7	V,E
Drafting appellate brief section	2/4/2015	6	V,E
Drafting appellate brief section	2/5/2015	2.8	V,E
Drafting appellate brief section	2/6/2015	4.2	V,E
Drafting appellate brief section	2/9/2015	3.3	V,E
Revision of appellate brief sections	2/10/2015	1.8	V,E
Revising draft section of appellate brief	2/17/2015	7.2	V,E
Revise appellate brief	2/23/2015	6.5	V,E
Record citations	2/25/2015	8.7	V,E
Brief revision	2/27/2015	10.2	V,E
Brief revision	2/28/2015	4	V,E
Brief revision	3/1/2015	3.2	V,E
Brief revision	3/2/2015	6	V,E
Final brief revision	3/3/2015	4.2	V,E

TOTAL 102.3

EXCESSIVE**CLC**

<u>Emma Simson Description</u>	<u>Date</u>	<u>Hours</u>	<u>Code</u>
Motion to dismiss response	11/20/2013	8.2	E
Motion to dismiss response	11/21/2013	14.5	E
Research, drafting, etc. for Texas Motion to Dismiss Second Complaint	1/9/2014	1.9	E
Research, drafting, etc. for Texas Motion to Dismiss Second Complaint	1/10/2014	4.8	E
Research, drafting, etc. for Texas Motion to Dismiss Second Complaint	1/10/2014	5.1	E
Call w/ plaintiffs re: factual development	1/28/2014	1.5	D,E
Call w/ Armand and Chad re: consent protective order, algorithm	1/30/2014	1.0	D,E
Responding to Veasey counsel e-mails re: proposed order, schedule, hearing on 2/14/2014	2/13/2014	1.4	E
Document review, depo prep for Ingram	4/22/2014	2.0	E
Dепо prep for Ingram	4/23/2014	0.6	E
Ingram deposition	4/23/2014	1.2	D,E
Reviewing expert reports (Cormish), revising amended disclosures, coordinating witnesses, preparing documents for production, setting up call on witnesses/plaintiffs for all plaintiff groups, various calls with Armand re expert and fact discovery issues, various calls with Anna Baldwin, various calls with Michael Herron re database issues, call with April Martin re witnesses	6/23/2014	8.3	E
Expert report issues, including calls with various people (Chad, Armand, Herron, Anna Baldwin, Gabe, Matt), fact discovery issues (preparing documents for production, drafting responses to RFAs, preparing chart of witnesses/plaintiffs by themes, call re witnesses/plaintiffs with other groups), other case management issues	6/24/2014	8.3	E
Reviewing expert reports	7/8/2014	2.2	E
Reviewing expert reports	7/9/2014	0.8	E
Reviewing expert reports	7/9/2014	0.5	E
Reviewing expert reports	7/31/2014	0.8	E
Reviewing expert reports	7/31/2014	0.9	E
Legal research, drafting COLs	8/10/2014	1.1	E
Legal research, drafting COLs	8/10/2014	2.9	E
Legal research, drafting COLs	8/10/2014	1.3	E
Legal research, drafting COLs (Substantial name); case administration matters	8/12/2014	4.4	E
Drafting, revising FOFs, call with all plaintiffs re FOFs	8/17/2014	7.0	E
Revising FOFs, addressing expert analyses, document review	8/18/2014	1.5	E
Revising FOFs, addressing expert analyses, document review	8/18/2014	8.2	E
Revising FOFs, preparing deposition designations, preparing exhibits	8/18/2014	7.3	E

TOTAL 97.7

EXCESSIVE
DERFNER-ALTMAN

Derfner & Altman, LLC Armand G. Derfner, Esquire					
Aug-05-14	AGD	All plaintiffs meeting.	5.00		D,E
Aug-26-14	AGD	Prepare for trial, including review FOF/COL and def. FOF/COL, tel Herron, GH to prepare for Herron depo.	9.00	(1.00)	E
Aug-27-14	AGD	Prepare for trial, including review depos for depo designations, review exhibits and exhibit lists.	9.00	(1.00)	E
Aug-29-14	AGD	Prepare for trial, including order of witnesses, exhibits and demonstrative exhibits.	9.00	(1.00)	E
Aug-30-14	AGD	Prepare for trial, including review all documents and research to take to Corpus Christi.	12.00	(4.00)	E
Sep-01-14	AGD	In CC: prepare for trial, including review dots, conf co-counsel.	7.00		E
Sep-05-14	AGD	Trial and preparation.	10.00	(2.00)	E
Sep-06-14	AGD	Prepare for trial.	6.00		E
Sep-07-14	AGD	Prepare for trial.	6.00		E
Sep-08-14	AGD	Trial and preparation.	10.00	(2.00)	E
Sep-09-14	AGD	Trial and preparation.	10.00	(2.00)	E
Sep-10-14	AGD	Trial and preparation.	10.00	(2.00)	E
				103.0	(15.0)
TOTAL				<u>88.0</u>	